

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

*

UNITED STATES OF AMERICA

*

v.

*

Criminal No. SAG-21-202

DONALD HILDEBRANDT

*

* * * * *

MOTION FOR LEAVE TO FILE PHYSICAL EXHIBIT

Donald Hildebrandt, by counsel, hereby moves for leave to file a physical exhibit as Exhibit 5 to his Motion to Suppress Tangible and Derivative Evidence and for a *Franks* Hearing, ECF No. 39. A physical exhibit is necessary because the exhibit contains audio recordings that cannot be filed electronically on CM/ECF.

WHEREFORE, Mr. Hildebrandt requests that he be permitted to file a physical exhibit.

Respectfully submitted,

JAMES WYDA
Federal Public Defender for the
District of Maryland

/s/

LAURA GINSBERG ABELSON (#29363)
CULLEN MACBETH (#810923)
Office of the Federal Public Defender
100 South Charles Street
Tower II, 9th Floor
Baltimore, Maryland 21201
Telephone: (410) 962-3962
Facsimile: (410) 962-3976
Email: laura_abelson@fd.org
cullen_macbeth@fd.org